

1 Pursuant to Local Civil Rules 7(j) and 10(g), specially appearing defendants Safran
2 S.A., Safran Corporate Ventures, S.A.S., Safran Electrical & Power, S.A.S., and Safran
3 Helicopter Engines, S.A.S.U. (collectively, the “Safran Defendants”) and plaintiff Zunum
4 Aero, Inc. (“Zunum”) hereby submit this stipulated motion to extend the Safran Defendants’
5 time to serve initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) to
6 October 1, 2021. The parties state as follows:

7 WHEREAS, the Safran Defendants submit that good cause exists to extend the
8 Safran Defendants’ deadline to serve initial disclosures pursuant to Federal Rule of Civil
9 Procedure 26(a)(1) because Zunum and the Safran Defendants are close to resolving the
10 Safran Defendants’ jurisdictional defenses to Zunum’s claims, and an extension would avoid
11 unnecessary waste of party resources while the parties discuss such a resolution.

12 WHEREAS, the Safran Defendants submit that defendants The Boeing Company
13 and Boeing HorizonX Ventures, LLC consent to this stipulation.

14 WHEREAS, by entering into this stipulation, no Safran Defendant makes a general
15 appearance, submits to the jurisdiction of this Court, or waives any right or defense.

16 WHEREAS, this stipulated motion is filed in good faith and not for purposes of
17 delay.

18 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and
19 among Zunum and the Safran Defendants, subject to the Court’s approval, that the deadline
20 for the Safran Defendants to serve initial disclosures pursuant to Federal Rule of Civil
21 Procedure 26(a)(1) is extended to October 1, 2021.

22 STIPULATED MOTION TO EXTEND TIME – 2

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1 Dated: August 31, 2021

s/ Catherine S. Simonsen

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11 Dated: August 31, 2021

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22 STIPULATED MOTION TO EXTEND TIME – 3

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~~PROPOSED~~ ORDER

IT IS SO ORDERED.

Dated this 1st day of September, 2021



JAMES L. ROBART
UNITED STATES DISTRICT JUDGE